

1 [Submitting Counsel on Signature Page]

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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

10 People of the State of California, et al.

MDL No. 3047

11 v.
12 Meta Platforms, Inc., Instagram, LLC, Meta
13 Payments, Inc., Meta Platforms Technologies,
14 LLC

Case No.: 4:23-cv-05448-YGR
4:23-cv-05885-YGR
4:24-cv-00805-YGR

15 Office of the Attorney General, State of Florida,
16 Department of Legal Affairs

17 v.
18 Meta Platforms, Inc., Instagram, LLC., Meta
19 Payments, Inc.

20 v.
21 State of Montana, *ex rel.* Austin Knudsen,
22 Attorney General

23 v.
24 Meta Platforms, Inc., Instagram, LLC, Facebook
25 Holdings, LLC, Facebook Operations, LLC, Meta
26 Payments, Inc., Meta Platforms Technologies,
27 LLC, Siculus, Inc.

**DECLARATION OF MEGAN O'NEILL
IN SUPPORT OF STATE ATTORNEYS
GENERAL'S SECOND
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE SUPPLEMENTAL
INFORMATION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

28 IN RE: SOCIAL MEDIA ADOLESCENT
29 ADDICTION/PERSONAL INJURY PRODUCTS
30 LIABILITY LITIGATION

31 THIS DOCUMENT RELATES TO:

32 4:23-cv-05448; 4:23-cv-05885; 4:24-cv-00805

1 I, MEGAN O'NEILL, declare and state as follows:

2 1. I am a Deputy Attorney General in the Consumer Protection Section of the California
3 Department of Justice. I am a member of good standing of the State Bar of California. I make this
4 declaration based on my own personal knowledge. If called upon to testify, I could and would testify
5 completely to the truth of the matters stated herein.

6 2. I submit this declaration, as required by Civil Local Rule 7-11, in support of the State
7 Attorneys General's Second Administrative Motion for Leave to File Supplemental Information.

8 3. On July 29, 2024, Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc.,
9 and Meta Platforms Technologies, LLC ("Meta") sent a Notice of Intent to Serve Subpoenas and attached
10 copies of 26 subpoenas to the Notice.

11 4. On July 30, 2024, Meta sent a Notice of Intent to Serve Subpoenas and attached copies of
12 two subpoenas to the Notice.

13 5. On July 31, 2024, Meta sent a Notice of Intent to Serve Subpoenas and attached copies of
14 twelve subpoenas to the Notice.

15 6. On August 1, 2024, Meta sent a Notice of Intent to Serve Subpoenas and attached copies of
16 fourteen subpoenas to the Notice.

17 7. On August 9, 2024, Meta sent a Notice of Intent to Serve Subpoenas and attached copies of
18 three subpoenas to the Notice.

19 8. The subpoenas directed to state agencies differ from Meta's earlier Requests for Production
20 of Documents served on the State AGs which had purported to demand the State AGs to produce
21 documents in the possession of numerous state agencies, including these agencies. The subpoenas contain
22 new requests directed to the agencies, while also repeating a subset of the prior Requests for Production
23 of Documents.

24 9. Additionally, on August 6, 2024, Meta provided to counsel from the Massachusetts Office
25 of the Attorney General its Notice of Intent to Serve Subpoena *Duces Tecum* for Production on six
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1 Massachusetts entities in *Commonwealth of Massachusetts v. Meta Platforms, Inc.*, Massachusetts
2 Superior Court No. 2384CV02397-BLS1.

3 10. The State AGs seek leave to submit Meta's Notices of Intent to Serve Subpoenas through
4 their concurrently filed Second Administrative Motion for Leave to File Supplemental Information.

5 11. On August 19, 2024, counsel for Meta wrote that "Meta takes no position on" the State
6 AGs' Second Administrative Motion for Leave to File Supplemental Information.

7 12. The State AGs submit this declaration in lieu of a stipulation because Meta has indicated
8 that it takes no position on the State AGs' Administrative Motion for Leave to File Supplemental
9 Information.

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11 I declare under penalty of perjury that the foregoing is true and correct. Executed on August 19,
12 2024, in San Francisco, California.

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16 /s/ Megan O'Neill
17 MEGAN O'NEILL
18 Deputy Attorney General
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